



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
BIANCA R. PUCCI
Assistant United States Attorney
Nevada Bar No. 16129
501 Las Vegas Blvd. South, Ste. 1100
Las Vegas, Nevada 89101
Phone: (702) 388-5080
Bianca.Pucci@usdoj.gov
Attorneys for the United States

FILED
AUG - 3 2022
U.S. MAGISTRATE JUDGE
BY _____

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

2:22-MJ- 604 -VCF

UNITED STATES OF AMERICA,

Case No.

Plaintiff,

Application to Seal

v.

(Under Seal)

TRASHAWN WILLIAMS,

Defendant.

The government respectfully move this Honorable Court for an Order sealing the Complaint, Probable Cause Affidavit, Arrest Warrant, AO257, this Application, and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.


Pursuant to LR IA 10-5, the Government requests that the accompanying Complaint in this case be filed under seal. *See generally*, Fed. R. Crim. P. 6(e)(4) (permitting for the sealing of an indictment); *State of Arizona v. Maypenny*, 672 F.2d 761, 765 (9th Cir. 1982) (supporting the sealing of a search warrant when there is reasonable cause to believe that providing immediate notification may have adverse results); *Matter of Sealed Affidavit(s) to Search Warrants*, 600 F.2d 1256 (9th Cir. 1979) (same); *In re Braughton*, 520 F.2d 765, 766 (9th Cir. 1975) (same). In this case, such an order would be appropriate because the Complaint and Affidavit relate to

1 an ongoing criminal investigation into violation(s) of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), that
2 is neither public nor known to the target of the investigation and its disclosure may alert the
3 target to the ongoing investigation and pending arrest warrant. Public disclosure of the
4 information in the Complaint might possibly jeopardize the investigation because Defendant
5 Trashawn Williams is not yet in custody. Although Williams is generally aware of the
6 investigation and has spoken with investigators, he is unaware federal charges are being sought
7 against him. If he were to learn of the charges via an unsealed Complaint, he may take evasive
8 measures or destroy potential evidence, or both. Defendant Williams' knowledge that an arrest
9 warrant has been issued against him may also increase risks to law enforcement in
10 apprehending him. Accordingly, there is reason to believe that disclosure of the information
11 will jeopardize the investigation, including by giving Williams an opportunity to flee, destroy or
12 tamper with evidence, change patterns of behavior, or notify confederates.

13 DATED this 3rd day of August, 2022.

14 Respectfully submitted,

15 JASON FRIERSON
16 United States Attorney

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18 BIANCA R. PUCCI
19 Assistant United States Attorneys
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UNITED STATES OF AMERICA,

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Plaintiff,

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(Under Seal)

TRASHAWN WILLIAMS,

Defendant.

Based on the pending Application of the Government, and good cause appearing therefore, **IT IS HEREBY ORDERED** that the Complaint, the Probable Cause Affidavit, Arrest Warrant, AO257, the Government's Application, and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

IT IS FURTHER ORDERED THAT the Clerk's Office for the United States District Court for the District of Nevada must release the sealed complaint to the CJA Panel Resource Attorney, who may use the information in the sealed complaint for the sole purpose of securing defense counsel in a timely manner.

IT IS FURTHER ORDERED THAT, on the day of the arrest of the first defendant in this case, the CJA Resource Attorney may provide defense counsel a copy of the sealed complaint.

DATED this 3 day of August, 2022.



HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE